

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas 2
Transcontinental Gas Pipe Line
Company, LLC
Docket No. CP11-551-000
Eminence Storage Field Partial
Abandonment Project
§375.308(x)

July 21, 2015

Scott C. Turkington
Director, Rates & Regulatory
Transcontinental Gas Pipe Line Company, LLC
2800 Post Oak Boulevard (77056)
P.O. Box 1396
Houston, Texas 77251-1396

Re: Approval of Groundwater Monitoring and Mitigation Plan Modification

Dear Mr. Turkington:

I grant your May 14, 2015 request for Transcontinental Gas Pipe Line Company, LLC (Transco) to modify its Groundwater Monitoring and Mitigation Plan (GMMP) for the Eminence Storage Field in Covington County, Mississippi. On February 7, 2013, the Federal Energy Regulatory Commission issued an Order Approving Abandonment, Amending Certificate Authority, and Granting Clarification (Order), for Transco's request to abandon four of seven existing natural gas storage caverns at the Eminence Storage Field. On April 5, 2013, as revised August 26, 2013, Transco submitted a GMMP for the storage field that was approved by the Commission on August 27, 2013.

The GMMP provides the protocols for groundwater sampling and analyses, including the procedures for monitoring of wellbore headspace and recording the percent of the lower explosive limit (%LEL) of methane in the water supply wells that are monitored for water quality. Transco reports to the Commission, on a semi-annual basis, the results of the groundwater monitoring activities specified in the Order and GMMP.

The most recent report was filed on May 1, 2015, and Transco will submit the next report by November 1, 2015.

The modification to the GMMP is warranted due to the inability to collect representative measurements of pre- and post- purge wellbore headspace measurements. Transco is not able to obtain these samples due to the active operational capacity at the Southwest Jones (Rural) Water Association wells and at the 363 Brashier well that is used in poultry house operations. Transco indicates that these actively pumping wells must be vented to the atmosphere to allow for air exchange to the buildup and prevent negative pressure in the well when the pumps are operating. If the well is sealed as stipulated in the GMMP for 2 hours prior to measuring the headspace in the well, then the well cannot be operated as intended and inconveniences the well owners. As such, the wells must remain vented to the atmosphere to allow for normal operation of these supply wells rendering any headspace analysis non representative. Transco also states that the FW-Bounds supply well is operated as a pumping well but only occasionally. However, this well is likewise continually vented to the atmosphere.

Transco states that the continued monitoring of dissolved-phase analysis for methane in groundwater from these wells provides for a more representative method to determine the presence of methane in groundwater. Transco reports in its recently issued *Semi-Annual Report for Environmental Conditions* on May 1, 2015, that monitoring for dissolved-phase methane in these off site wells have shown that methane was either not detected or detected at trace concentrations close to the laboratory method detection limit of 10 micro grams per liter (0.01 milligrams per liter), and only during the 4th quarter sampling event.

Transco's approved modification to Environmental Condition 4.a. of the Order revises its GMMP to:

- a. conduct quarterly monitoring for dissolved-phase analysis of methane in the 363 Brashier well, Transco's FW Bounds supply well, and the Southwest Jones Water Association (SWJWA) supply wells (wells, 1, 3, and 4)¹ completed within the Citronelle, and the Upper and Lower Catahoula aquifers, respectively.

In addition, the GMMP is now modified by deleting the "Wellbore Headspace Monitoring" provisions located in Section 2, page 7. However, if future monitoring events show a positive trend for dissolved-phase methane in these wells, then the GMMP

¹ Stated on page 4 of the GMMP, SWJWA well 2 has been cemented and decommissioned; therefore, the FERC-approved GMMP specifies the monitoring of SWJWA wells 1, 3, and 4.

provision may be reinstated and Transco will make the necessary modifications to monitor these wells for wellbore headspace.

I remind you that Transco must comply with all applicable remaining terms and conditions of above-referenced Order, as well as procedures stipulated in your previous filings. If you have any questions regarding this approval, please contact John Wisniewski at (202) 502-8052.

Sincerely,

Terry L. Turpin
Director, Division of Gas-
Environment and Engineering

cc: Public File, Docket No. CP11-551-000